

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARIA SANCHEZ, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

NEW ERA ENTERPRISES, INC. and NEW
ERA LIFE INSURANCE COMPANY,

Defendants.

Case No. 4:25-cv-00732

**PLAINTIFF'S MOTION TO CONTINUE INITIAL
PRETRIAL AND SCHEDULING CONFERENCE**

Plaintiff Maria Sanchez respectfully moves the Court to continue the Initial Pre Trial and Scheduling Conference set for April 2, 2025 at 3:30 PM (Dkt. No. 5) to allow sufficient time for Defendant to appear and for the parties to meet and confer and jointly propose a case schedule and discovery plan. Plaintiff filed her complaint on February 19, 2025 and Defendant executed the Waiver of Service of Summons on February 28, 2025 making its deadline to answer or otherwise respond to the Complaint on or before April 29, 2025. Dkt. No. 9. As Defendant has not formally appeared in the action, Plaintiff believes it would be premature to propose a case management schedule and discovery plan to the Court prior to Defendant's formal appearance and without conferring with Defendant regarding same. Accordingly, Plaintiff respectfully requests that the Court continue the Initial Status Conference until fourteen (14) days following Defendant's deadline to answer or otherwise respond to the Complaint or as soon thereafter as the Court may accommodate.

Dated: March 19, 2025

Respectfully Submitted,

/s/ Joe Kendall
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Attorneys for Plaintiff and The Proposed Class

**Pro Hac Vice application forthcoming*

CERTIFICATE OF CONFERENCE

As Defendant has not yet appeared in the action, counsel for Plaintiff has been unable to obtain the Defendant's position on the issues in this motion.

/s/ Joe Kendall
JOE KENDALL

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served upon its filing via this Court's CM/ECF system on this 19th day of March, 2025, to all counsel of record.

/s/ Joe Kendall

JOE KENDALL